

LAW OFFICES
WILLIAMS & CONNOLLY LLP*

SARA F. DHANJI
(202) 434-5128
sdhanji@wc.com

680 MAINE AVENUE SW
WASHINGTON, DC 20024
(202) 434-5000
WWW.WC.COM

EDWARD BENNETT WILLIAMS (1920-1988)
PAUL R. CONNOLLY (1922-1978)


MEMO ENDORSED

January 31, 2023

VIA ECF

The Honorable Edgardo Ramos
United States District Court Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square, Courtroom 619
New York, NY 10007

The Parties are directed to submit a joint status letter
by no later than March 2, 2023. SO ORDERED.


Edgardo Ramos, U.S.D.J.
Dated: **January 31, 2023**
New York, New York

Re: *Haitian Bridge Alliance et al. v. U.S. Dep't of Homeland Sec. et al.*, No. 1:22-cv-08344-ER

Dear Judge Ramos:

Pursuant to the Court's Order, Dkt. No. 33, I write on behalf of all parties to provide the Court with a status report regarding the parties' progress in resolving the two Freedom of Information Act ("FOIA") requests at issue in this case.

Since the parties submitted their December 21, 2022 letter to the Court, Dkt. No. 32, the parties have continued meeting and conferring. Plaintiffs sent a letter further explaining their position to Defendants on December 23, 2022, and Defendants provided a response letter on January 24, 2023. The parties are still in the midst of negotiations regarding the requests. The parties thus respectfully propose that they submit a second joint letter to the Court by March 2, 2023, regarding the status of their progress in resolving these requests and raising any disputes that require the Court's intervention, to the extent the parties are not able to resolve such disputes informally.

We thank the Court for its consideration of this matter.

Respectfully submitted,

/s/ Sara Fatima Dhanji
Stephen J. Fuzesi (Bar No. SF2000)

January 31, 2023

Page 2

Sara Fatima Dhanji (*pro hac vice*)
WILLIAMS & CONNOLLY LLP
680 Maine Avenue, SW
Washington, DC 20024
Telephone: (202) 434-5000
Facsimile: (202) 434-5029
Email: sfuzesi@wc.com
sdhanji@wc.com

For Matters in New York:
WILLIAMS & CONNOLLY LLP
650 Fifth Avenue
Suite 1500
New York, NY 10019

Counsel for Plaintiffs

cc: Dana Walsh Kumar and Tomoko Onozawa, Counsel for Defendants (via ECF);
Lauren Wilfong, Sarah Decker, Sarah Telo Gillman, Allison Crennen-Dunlap, Tess
Hellgren, and Stephen Manning, Counsel for Plaintiffs (via ECF)